

July 23, 2018

Colleen Coogan  
Marine Mammal Take Reduction Team Coordinator  
NOAA NMFS GARFO

Dear Colleen,

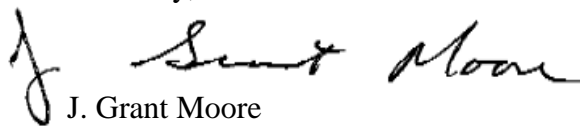
I'm writing to offer a proposal for the Atlantic Large Whale Take Reduction Team's (TRT) consideration. This proposal regards offshore lobster fishery weak link regulations and is timely given the Whale Release Rope and Gear Marking subcommittee's recent discussion of possible weak link changes to bring to the TRT in October (as noted in the April meeting Key Outcomes document).

To safely operate in the fall and winter months, the offshore lobster fishery working the continental shelf edge in waters deeper than 100 fathoms (182 meters) should be allowed 2,000 lb. weak links (see Figure 1). This fishery is comprised of less than 30 vessels, each fishing not more than 45 trawls, operating in an area and time of year with extremely low right whale co-occurrence. During the months of approximately October through March, they operate at depths that place their gear just inside that of the red crab fishery, which is operating with 2000 lb. weak links.

The continental shelf edge below Georges Bank has steep topography and strong currents year-round. In the cooler months, when the lobster fishery tracks lobsters into deeper water, the area is subjected to counterclockwise eddies and strong storms coming up the coast. While not as steep generally, the edge to the west and south of Georges Bank experiences warm water eddies and strong winter storms given the proximity to the gulf stream current; these conditions have intensified as the climate warms. To account for the difficult ocean conditions along the edge, long endlines are fished that, when secured with weaker links, readily break, causing dangerous working conditions, as well as considerable cost to the fleet in lost time, lost gear, and surface system replacement costs. Without a modest change to the weak line regulations, compliance will be an issue.

Thank you for consideration of this proposal. I'm available to discuss further or provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Grant Moore". The signature is fluid and cursive, with a large initial "J" and a stylized "M".

J. Grant Moore  
ALWTRT Alternate Member  
Broadbill Fishing Inc & F/V Direction

Peter Brown  
Brown Fishing Co. & F/V Rachel Leah

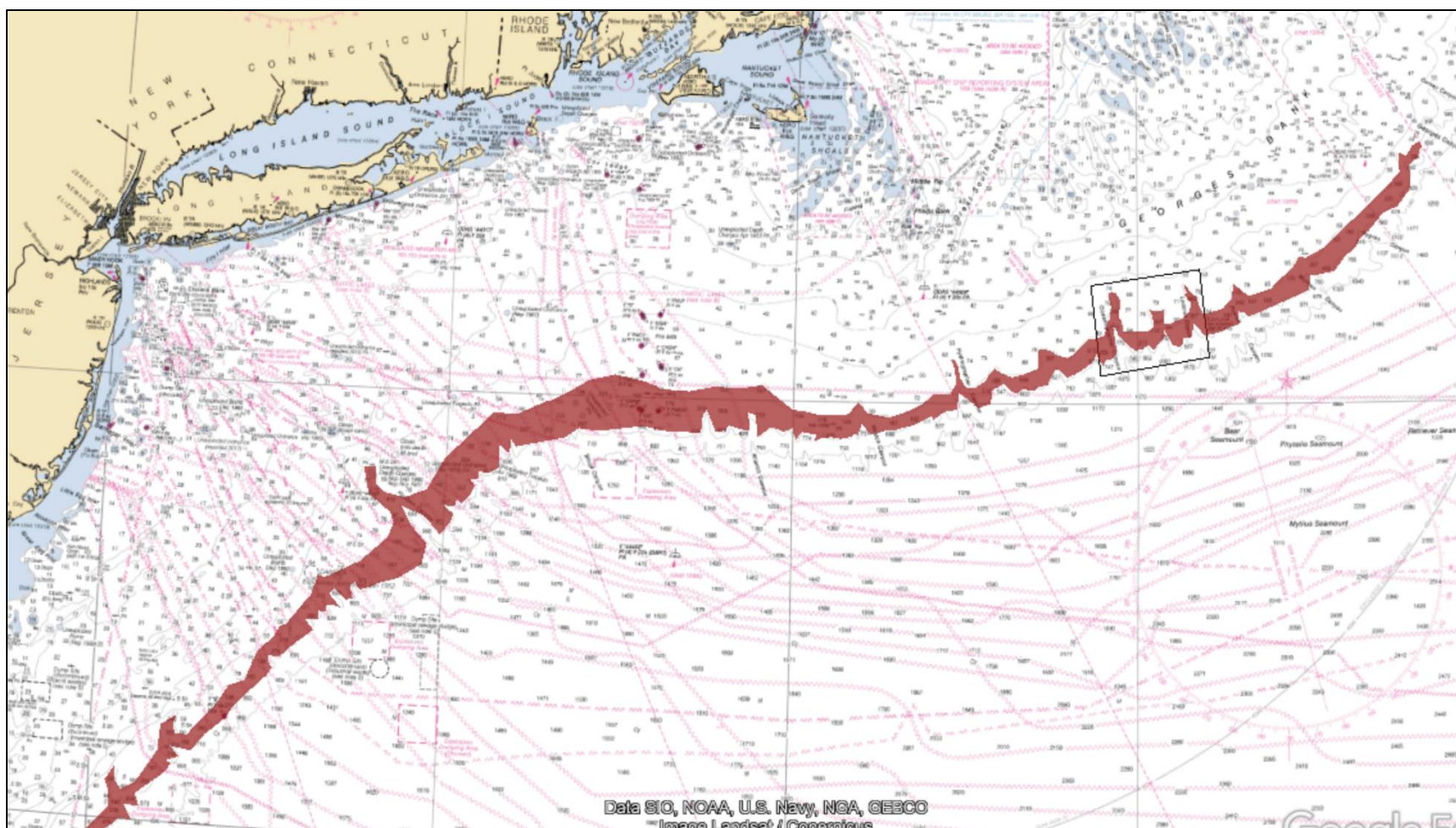


Figure 1: Estimate of the area proposed for a 2000 lb weak link exemption. Red shaded area is between the 100 and 500 fathom contours. Black box shows the canyons portion of the Northeast Canyons and Seamounts Marine Monument.